1	HAGENS BERMAN SOBOL SH	APIRO LLP	
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6	Interim Co-Lead Consumer Class	Counsel	
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8	UNI	ITED STATES I	DISTRICT COURT
9	NORTHERN DISTRICT OF CALIFORNIA		
10	SAN FRANCISCO DIVISION		
11	MAXIMILLIAN KLEIN, et al.,	SANTIANCIS	Case No. 20-cy-08570-JD
12	WAXIVIILLIAN KLEIN, et at.,		Case No. 20-CV-083/0-JD
13		Plaintiffs,	DECLARATION OF STEVE W.
14	V.		BERMAN IN SUPPORT OF
15	META PLATFORMS, INC.,		APPLICATION FOR APPOINTMENT AS INTERIM LEAD CONSUMER CLASS COUNSEL BY SHANA E.
16		Defendant.	SCARLETT OF HAGENS BERMAN
17			SOBOL SHAPIRO LLP, OR IN THE ALTERNATIVE, SHANA E.
18			SCARLETT AND REBECCA A. PETERSON OF LOCKRIDGE
19			GRINDAL NAUEN P.L.L.P.
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21	This document relates to:		
22	All Consumer Actions		
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BERMAN DECL. ISO SCARLETT APPL. FOR APPOINTMENT AS INTERIM LEAD COUNSEL Case No. 20-CV-08570-JD

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27 28 I, Steve W. Berman, declare as follows:

- I am an attorney duly licensed to practice law before this Court. I am a member of the Washington Bar, and I have been admitted to this Court *pro hac vice*. I am the managing partner of Hagens Berman Sobol Shapiro LLP and counsel for Plaintiff Rachel Banks-Kupcho in the aboveentitled action.
- 2. I submit this declaration in support of the application for appointment as interim lead consumer counsel by Shana E. Scarlett of Hagens Berman Sobol Shapiro LLP, or in the alternative, Shana E. Scarlett and Rebecca A. Peterson of Lockridge Grindal Nauen P.L.L.P. Based on personal knowledge or discussions with counsel in my firm of the matters stated herein, if called upon, I could and would competently testify thereto.
- 3. I founded my firm in 1993 and have been lead or co-lead counsel in the largest litigation recovery ever (state tobacco litigation), the largest approved antitrust settlement (In re Visa Antitrust Litigation); and the largest automobile defect settlement at the time (In re Toyota Unintended Acceleration Litigation), to name just a few of the firm's high profile cases. I have tried numerous class actions including Alston v. NCAA before Judge Wilken, which was affirmed by a unanimous Supreme Court. If Shana Scarlett is appointed co-lead, I will be the lead trial lawyer, with Ms. Scarlett with me on the trial team. I have been involved in this case with my trial hat on, meaning I give input to the direction of the case from a trial perspective.
- 4. The firm has been devoted to promoting the role of female lawyers, including as lead counsel in significant cases. This last year we named six new partners, five of whom are female attorneys. Our first Management Committee, formed in 2000, was comprised of four lawyers, three of them are women. Promoting diversity is one of my goals as Managing Partner.
- 5. During the course of this litigation Ms. Scarlett has mentioned that she believes her work has been dismissed by the Quinn lawyers. We have discussed ways for this attitude to be dealt with, but Ms. Scarlett reports the behavior has not changed. If Ms. Scarlett believes she is not being treated equally, I fully support and encourage her to bring that that to the Court's attention. Ms. Scarlett acts in a leadership position in many cases and I have not heard her raise this issue previously.

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1	6. I and my firm do not raise this issue lightly. I have several cases where I and/or the		
2	firm are either co-lead with Quinn or we are a co-lead and Quinn is on the Executive Committee.		
3	So, raising this issue in light of our ongoing relationships is not the easy road to take –but it is the		
4	just one.		
5	I declare under penalty of perjury under the laws of the United States that the foregoing is		
6	true and correct. Executed this 3rd day of February 2023 at Seattle, Washington.		
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8	s/Steve W. Berman		
9	STEVE W. BERMAN		
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BERMAN DECL. ISO SCARLETT APPL. FOR APPOINTMENT AS INTERIM LEAD COUNSEL Case No. 20-CV-08570-JD